

ORIGINAL

INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

Arizona Corporation Commission

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SUSAN BITTER SMITH, Chairman

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AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF
AMERICAN BROADBAND AND
TELECOMMUNICATIONS COMPANY FOR
DESIGNATION AS A WIRELESS ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE
STATE OF ARIZONA

DOCKET NO. T-20924A-15-0068

MOTION TO INTERVENE

Pursuant to A.A.C. R14-3-105, the Arizona Local Exchange Carriers Association
("ALECA") hereby moves to intervene in the above-captioned case.

I Service

Please serve all documents on:

Craig A. Marks

Craig A. Marks, PLC

10645 N. Tatum Blvd., Ste. 200-676

Phoenix, Arizona 85028

(480) 367-1956 (Direct)

(480) 304-4821 (Fax)

Craig.Marks@azbar.org

Attorney for ALECA

II Interest in Proceeding

ALECA is comprised of small telephone companies and member-owned cooperatives,
all of which are providing local exchange telecommunications services to customers in rural,
high cost areas of Arizona, and all of which are "rural telephone companies" as defined by the
Communications Act of 1934, as amended (the "Act") 47 U.S.C. 0 153(37). ALECA's members
are:

- Fort Mojave Telephone Company;
- Frontier Communications Corporation;
- Gila River Telecommunications, Inc.;

- 1 • Hopi Telecommunications, Inc.;
- 2 • Midvale Telephone Exchange, Inc.;
- 3 • San Carlos Apache Telecommunications Utility, Inc.;
- 4 • South Central Communications;
- 5 • Table Top Telephone Company, Inc.;
- 6 • TDS;
- 7 • Tohono O'odham Utility Authority; and
- 8 • Valley Telephone Cooperative; and
- 9 • Zona Communications.¹

10 Each ALECA member, including its Tribally-owned members, receives support from the
11 Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each also provides
12 discounted Lifeline telephone service and receives compensation for the discounts from the
13 FUSF. American Broadband and Telecommunications Company ("American Broadband") seeks
14 designation as an Eligible Telecommunications Carrier ("ETC") so that it may provide the
15 services identified in its Application to eligible customers in Arizona. ALECA is concerned that
16 American Broadband's proposed service request may raise jurisdictional issues concerning the
17 provision of services on tribal lands without tribal authorization.

18 ALECA reserves the right to take positions on any other issues in this case.

19 No other party can adequately represent ALECA's interests.

20 **III Requested Relief**

21 ALECA asks that the Commission grant its Motion to Intervene.

¹ Fort Mohave Telecommunications, Gila River Telecommunications, Hopi Telecommunications, San Carlos Apache Telecommunications Utility and the Tohono O'odham Utility Authority are tribally-owned telephone Companies, which are not subject to the jurisdiction of the Arizona Corporation Commission.

1 RESPECTFULLY SUBMITTED on March 9, 2015.
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15 **Original and 13 copies filed**
16 on March 9, 2015, with:

17
18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington
21 Phoenix, Arizona 85007
22

23 **Copy of the foregoing mailed and e-mailed**
24 on March 9, 2015, to:

25
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29 Phoenix, AZ 85004-2202